

Laurie Garland

July 6, 2021

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND,)
)
Plaintiff,)
)
vs.) NO. CIV-20-306-RAW
)
)
STATE OF OKLAHOMA, ex rel)
OKLAHOMA DEPARTMENT OF)
CORRECTIONS,)
CHRISTOPHER REDEAGLE,)
individually,)
SHARON McCOY, individually,)
JOE ALLBAUGH, individually,)
RABECKAH MOONYHAM,)
individually,)
HEATHER CARLSON, individually,)
and BOARD OF CORRECTIONS,)
)
Defendants.)

DEPOSITION OF LAURIE ELIZABETH GARLAND
TAKEN ON BEHALF OF THE DEFENDANTS
IN OKLAHOMA CITY, OKLAHOMA
ON JULY 6, 2021, 2021

REPORTED BY: JANA C. HAZELBAKER, CSR

DEFENDANT'S
EXHIBIT

5

1 A Yes.

2 Q Was that on a regular basis?

3 A Pretty consistently, yes.

4 Q Okay. What was the nature of the verbal
5 conversations that you all would have?

6 A Well, it started out very informal, just
7 like I said, he asked, you know, "What are you doing
8 here, what brings to you prison," et cetera.

9 We started talking and he just --
10 conversations were minimal for a certain degree, but
11 then it just escalated into, "Well, I really want to
12 kiss you," and things of that nature --

13 Q Right.

14 A -- which was uncomfortable.

15 Q Right. Did you, I guess, respond to him in
16 any way that was, I guess, romantic in these verbal
17 conversations?

18 A In verbal conversations? No. But I did in
19 letters, yes.

20 Q Okay. And who would you say wrote the
21 first letter?

22 A I did.

23 Q Okay.

24 A It gets lonely in prison, so you write.

25 You just take yourself on a little mind trip journey.

1 A Not to my knowledge.

2 Q Okay. Randy Knight, you mentioned him a
3 minute ago. Who is he?

4 A He is the IA.

5 Q And that's Internal Affairs?

6 A Yes, sir.

7 Q Okay. And what was your contact or
8 contacts with Randy Knight?

9 A He came on the day for -- when Redeagle
10 resigned and provided me with some of this
11 information that he'd found and did my basic
12 interview.

13 Q Okay.

14 A And heard my side of the story.

15 Q What, if anything, did Randy Knight do
16 personally to violate your rights?

17 A He really didn't. He was actually the more
18 comfortable person to talk to.

19 Q Okay. Who is Penny Lewis?

20 A That is also a guard.

21 Q Okay. And what were your contacts with
22 Penny Lewis?

23 A Just -- she just worked there.

24 Q Okay. What, if anything, did Penny Lewis
25 do personally to violate your rights?

1 A Like I said, I don't think that she
2 necessarily personally intentionally did anything.

3 Q What is -- or who is, sorry, Whitney Louis?

4 A She's the psychiatrist.

5 Q And what were your contacts with Whitney
6 Louis?

7 A She was the one that I started with the
8 self-help groups and stuff. And she's also one of
9 the ones that wrote one of these reports.

10 Q Did Whitney Louis do anything personally to
11 violate your rights?

12 A I don't know.

13 Q How would you characterize Whitney Louis?

14 A She's -- she's pretty open, I guess.

15 Q She struck you as an intelligent person?

16 A I believe so.

17 Q Okay. Did she strike you as an honest
18 person?

19 A I -- I guess. I mean, for the most part.

20 Q Who is Jason Mann with two "n"s?

21 A That's another Redeagle term of return
22 sender.

23 Q Okay. No such real person?

24 A I don't know.

25 Q That you know of?

1 A I've never -- I've never met him.

2 Q Who is Sharon McCoy?

3 A That's the former warden before Natalie
4 Cooper.

5 Q Okay. What were your contacts with Sharon
6 McCoy?

7 A I didn't see her a whole lot except if she
8 came to church services to watch us perform, and that
9 was every so often.

10 Q Okay. What, if anything, did Sharon McCoy
11 do personally to violate your rights?

12 A Well, she wasn't around a whole lot there
13 towards the transitioning of Ms. Cooper, but she was
14 in and out. She was just here and there, hit and
15 miss.

16 Q Okay. Who is Rabeckah Moonyham?

17 A That is another guard, as well, female.

18 Q What were your contacts with Rabeckah
19 Moonyham?

20 A I mean, just conversation.

21 Q What, if anything, did Rabeckah Moonyham
22 personally do to violate your rights?

23 A I guess she's also on the Board, I believe,
24 of overseeing things at Eddie Warrior.

25 Q She's a guard on the Board?

1 A She's a guard, but they have a team of
2 certain people that are in charge, I believe, like to
3 oversee the others, just like a hierarchy.

4 Q Did she do anything personally to violate
5 your rights that you're aware of?

6 A I don't know. No.

7 Q Okay. We mentioned him earlier, but Steve
8 Schardein, he's both a former step-relative and also
9 a former romantic interest; is that correct?

10 A Correct.

11 Q Okay. When was your last contact with
12 Mr. Schardein?

13 A In July of 2020.

14 Q Okay. You have no reason to believe
15 Mr. Schardein participated in any violation of your
16 rights, do you?

17 A I don't -- I don't know if he did or not.

18 Q Okay. Who is Rachel Vernon?

19 A That is the head of, like, the medical, at
20 Eddie Warrior.

21 Q Is Rachel a doctor?

22 A I'm not sure if she's a licensed doctor or
23 if she just oversees the medical staff. I'm not
24 exactly sure what her criteria is.

25 Q What were your contacts with Rachel Vernon?